

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to:

Underwriting Members of Lloyd's Syndicate 2, et al. v. Al Rajhi Bank, et al., No. 16-cv-07853
Addesso, et al. v. Kingdom of Saudi Arabia, et al., No. 16-cv-09937
Aguilar, et al. v. Kingdom of Saudi Arabia, et al., No. 16-cv-09663
Hodges, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-00117
Aiken, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-00450
Charter Oak Fire Insurance Co., et al. v. Al Rajhi Bank, et al., No. 17-cv-02651
Abarca, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-03887
Arrowood Indemnity Co., et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-03908
Abedhajajreh, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-06123
Muenchener Rueckversicherungs-Gesellschaft Aktiengesellschaft in Muenchen, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-07914
Abbate, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-08617

**DECLARATION OF J. SCOTT TARBUTTON TRANSMITTING DOCUMENTS IN
FURTHER SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANT
AL RAJHI BANK'S RENEWED MOTION TO DISMISS**

I, J. Scott Tarbutton, declare under penalty of perjury, as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above-captioned matter, a member of the law firm Cozen O'Connor, and a member of the Plaintiffs' Executive Committees in this MDL litigation.

2. I respectfully submit this Declaration to transmit to the Court documents in further support of Plaintiffs' July 22, 2024 Opposition to Defendant Al Rajhi Bank's Renewed Motion to Dismiss and Motion for Summary Judgment for Lack of Personal Jurisdiction. *See* ECF Nos. 10152-10153.

3. As set forth in the July 22, 2024 Opposition, Plaintiffs submitted business records certifications from the Central Intelligence Agency (“CIA”) and the Federal Bureau of Investigation (“FBI”) for documents produced by those agencies in response to Plaintiffs’ subpoenas, which are cited in Plaintiffs’ Corrected Averment (ECF No. 9764) and other pleadings. *See* Plaintiffs’ Exhibits K, L, and M at ECF Nos. 10153-11 through 10153-13.

4. Plaintiffs’ Opposition also informed this Court and Al Rajhi Bank that the Department of Justice (“DOJ”) was working to obtain additional business records certifications from the FBI and Treasury Department to address other FBI and Treasury documents cited in Plaintiffs’ pleadings not covered by previously-filed certifications, and explained further that the DOJ needed additional time to secure those additional certifications. *See* ECF No. 10153-4 at p. 2, n.1.

5. The DOJ has now provided the aforementioned FBI and Treasury certifications to the Plaintiffs, which are being transmitted to the Court herewith.

6. The exhibits to this Declaration are numbered consecutively following the exhibits that were filed with the Declaration of J. Scott Tarbutton, Esq., dated July 22, 2024, ECF No. 10153, which ended with Exhibit M.

7. Attached hereto as Exhibit N is a true and correct copy of the Declaration of Miad Maleki, U.S. Department of the Treasury, dated September 16, 2024.

8. Attached hereto as Exhibit O is a true and correct copy of the Declaration of Lawrence D. Buckley, Jr., Federal Bureau of Investigation, dated July 29, 2024.

Executed in Ashburn, VA on September 27, 2024.

A handwritten signature in blue ink, appearing to read "J. SCOTT TARBUTTON".

J. Scott Tarbutton, Esq.

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